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COMMITTEE OF EXPERTS ON THE
TRANSPORT OF DANGEROUS GOODS

Sub-Committee of Experts on the
Transport of Dangerous Goods
(Fourteenth session,
Geneva, 8-18 December 1997,
agenda item 3)

INCORPORATION OF PROVISIONS CONCERNING RADIOACTIVE MATERIAL IN THE MODEL REGULATIONS

Report of the Class 7 Working Group of the IMO Sub-committee on Dangerous Goods, Solid Cargoes and Containers (DSC)

Transmitted by the International Maritime Organization (IMO)

The Class 7 Working Group (WG) was convened by the 2nd session of the DSC, 24-28 February 1997, under the Chairmanship of Mr. C. Young (United Kingdom).

The following representatives and observers participated in the Group:

CANADA	NETHERLANDS
FRANCE	SWEDEN
GERMANY	TURKEY
JAPAN	UNITED KINGDOM

INTERNATIONAL ATOMIC ENERGY AGENCY

Agenda Item 3.

As a basis for the discussions the WG referred to DSC 2/INF.11 dated 13 December 1996 (available only in English). This paper presented the draft revised class 7 of the IMDG Code, edited to indicate the necessary amendments to align the text of the IMDG Code with the 1996 edition of the IAEA Regulations for the Safe Transport of Radioactive Material (ST-1). Shaded/strikeout text indicates new or replacement text and deleted text respectively.

The WG first established a work plan shown at Annex 1 that will produce the class 7 provisions for Amendment 30 of the IMDG Code fully aligned with ST-1 in the restructured format discussed under Agenda Item 8.

The WG reviewed and amended as necessary DSC 2/INF.11. The outcome of these effort is shown at Annex 2. Work on how the information contained in the Schedules can be best incorporated into the new structure for class 7 substances will be carried out in September 1997 as a result of decisions taken at this session. It will be important to ensure that no information is lost in this process. The work presented in Annex 2 is a first step and only brings the section of the IMDG Code on class 7 into line with ST-1 using the existing format. The WG is of the opinion that this work will make it easier to take the next step of using the new format. It is envisaged that this work will carry on under the auspices of the E & T Group in September 1997 and the WG will be in a position to prepare a proposal for consideration at DSC 3.

In undertaking its review of DSC 2/INF.11 the WG made a number of observations and recommendations:

1 Historically it has been sufficient for all users of the Code to include only the relevant parts of the IAEA Regulations. However in the light of proposals to make the Code mandatory, it may be necessary to include the package design and test requirements of the IAEA Regulations, so that the Code becomes a self supporting document. The WG invites the DSC to comment.

2 The WG believes that the class 7 section of the IMDG Code should use only SI units as in ST-1, and the WG seeks confirmation on this point from the DSC for the Code as a whole. It should be noted in particular that this decision results in the deletion of both the segregation table in feet and the nomograph for safe distances (feet).

3 The WG recommends that the Secretariat note that other aspects of the work under the remit of the DSC will need to be reviewed and updated as a result of the incorporation of ST-1 into the IMDG Code. Namely, the General Introduction to the Code, the emergency schedules, the medical first aid guide, and the class 7 aspects of the bulk cargo requirements. In particular:-

31. ST-1 recognises IBC's as a packaging for the carriage of certain class 7 substances. The WG recommends that the General Introduction of the IMDG Code be checked for consistency with this change.

32. The WG requests that the E & T Group note that the criticality safety label is newly introduced into ST-1. Provision will need to be made for this label in the Code as appropriate.

4 The WG asked the IAEA to check that Table 1 of the Appendix is as published in ST-1 and to report back to the WG as soon as possible. In particular, the WG was aware that a few late changes were introduced into ST-1.

5 The definitions contained in the section dealing with class 7 will need to be checked to ensure that only necessary definitions are included. That is, that they are not defined appropriately elsewhere in the Code and that they are actually used in the class 7 text.

6 The WG need to review the basis for the segregation tables and ensure that the text in the Code is compatible with ST-1 and the Basic Safety Standards of the IAEA.

7 The WG noted, in particular, that 'competent authority' is not currently defined in the introduction to class 7, nor did it appear to be appropriately defined in the General Introduction to the Code. A definition based on the ST-1 definition will be inserted into the revised INF 11 text for class 7, but in square brackets, to reflect the view of the WG that such a definition is necessary.

Agenda Item 8

Further to DSC 2 decisions to proceed with restructuring the IMDG Code along the lines of DSC 2/3 Annex 9 Appendix 3, the WG discussed how the class 7 provisions might be best incorporated into the new structure.

France reported on the work being carried out by an RID/ADR working group to incorporate ST-1 into a new format which takes account of the new format for the UN Recommendations. The results of this effort will be considered by the Joint RID/ADR Working Group at a meeting to be held in March 1997. The WG had available the table of contents for the UN Recommendations as agreed at the 19th session of the Committee of Experts on the Transport of Dangerous Goods (2-11 December 1996), attached at Annex 3. It was agreed that as far as practicable the structure of the UN Recommendations should be used as the framework for the development of the class 7 provisions of the reformatted IMDG Code, in conjunction with the main table as presented in DSC 2/3 Annex 9 Appendix 3 (see Annex 4 of this paper).

The IAEA reported that the on-going efforts to restructure the Dangerous Goods Recommendations of the UN Committee of Experts and certain modal regulations to a consistent format and content provide a timely opportunity to evaluate how class 7 requirements might be better presented.

Accordingly, as a first step, the IAEA is now proceeding with a restructuring of their Safety Standards Series No. ST-1 " Regulations for the Safe Transport of Radioactive Material (1996 Edition)" without changing any of the requirements, into a form compatible with the proposed new format for the UN Recommendations. This work will be started in April 1997 and the outcome of this first meeting will be made available to the September Meeting of the E and T Group. The IAEA intend to continue, however, as necessary to review, revise and publish their transport regulations (ST-1) in the familiar form of this document. It is envisaged that, following this first step, it may be possible to integrate the complete Class 7 requirements into the UN Recommendations.

However, this next step would require the agreement of both the UNECE and the IAEA, which has not yet been sought or obtained from either Organization. The IAEA's Transport Safety Standards Advisory Committee (TRANSSAC) will be asked to support this proposal when it next meets in Vienna 10-14 March 1997 and the outcome will be made known to the UN Sub-committee of Experts on the Transport of Dangerous Goods at it's meeting in July 1997.

Netherlands recognised that other work was already under way in other fora and suggested that the WG should concentrate its efforts on completing columns 15 (stowage and segregation) and 16 (properties and observations) as these were unique to the IMDG Code. The columns should contain only information that was necessary for the mariner. It was noted that some columns of the main table would not apply to class 7 and this could be shown as a dash (-). Other columns would not be large enough to contain all the relevant information. In this case, it was considered appropriate to enter a reference in the column to some other part of the document. This might be to text contained in a paragraph, section or chapter or refer to another table. As a principle it was agreed to reduce the duplication of text that is a feature of the current format of a general introduction and schedules for class 7. It was noted that the schedules in ST-1 were preceded by common provisions for schedules 1-4 and 5-14 and this had greatly reduced the amount of repetition.

The WG recommended that the Secretariat ensure that this working paper is circulated in advance to the E&T Group meeting 1-10 September 1997 for further development by the class 7 WG. The class 7 work is unlikely to be complete in September and the WG decided that it will be necessary to reconvene at DSC3 to complete work on such matters as the Maritime First Aid Guide, the Emergency Schedules and the Bulk Code.

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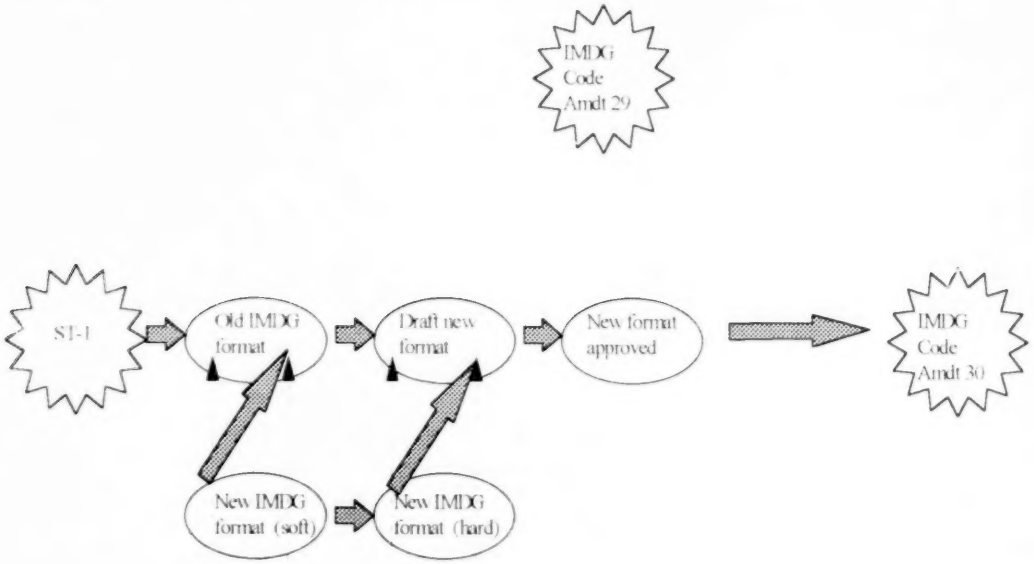
Annex

Milestones for new Class 7 provisions and new formatting of IMDG Code



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